

**COVAD COMMUNICATIONS COMPANY'S
RESPONSES TO RECORD REQUESTS
MA D.T.E. 99-271**

Record Request 163:

Respondent: Michael Moscaritolo, Director, Network Deployment

MS. CARPINO: I believe in another proceeding Covad had indicated that U.S. West has a shorter interval for cageless collocation.

MR. MOSCARITOLO: In the State of Texas, with SWBell.

MS. CARPINO: SWBell?

MR. MOSCARITOLO: Southwestern Bell. They provide space within 45 days from firm order.

MS. CARPINO: Could you provide us with some additional information about that?

MR. MOSCARITOLO: Yes.

MS. CARPINO: We'll make that Record Request 163.

MS. BALLARD: And could you just expand upon -- you say it's not an apples-to-apples comparison. If you could just expand upon that in your response.

MR. MOSCARITOLO: Yes.

(RECORD REQUEST.)

Response to 163:

The interval for cageless collocation in Washington state is 45 *calendar days* from receipt of 50% deposit where space and power are readily available. This interval compares to Bell Atlantic's interval for CCOE that is 90 *business days* if the space has been secured or 105 *business days* if the space has not been secured. Where space and power are not readily available, USW will be make cageless collocation available in 90 *calendar days*. USW has 21 calendar days to provide Covad with information on space availability. In sum, even with this additional time, USW provisions cageless collocation in 66 *calendar days* and is now meeting or beating this interval.

A major factor that contributes to this shorter cageless interval is the fact that USW, unlike BA: (1) does not require Covad to collocate in a wholly segregated part of the central office; (2) does not surround Covad's collocation space with walls; (3) does not require Covad to use separate entrances; and (4) does not require Covad to await the installation of additional security beyond existing security measures deployed in its central offices. Instead, USW allows Covad to collocate in the same space that USW's

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equipment is located and to have 24x7 access to USW's central offices using swipe cards.

The interval for cageless collocation in Covad's interconnection agreement with SBC-Texas is 55 *calendar* days from the receipt of Covad's acceptance of the quotation where Covad installs its own bays. For 1-5 collocation applications, SBC will provide space availability information within 10 business days. For 6-20 collocation applications, the interval on space availability is 25 business days.

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Record Request 164:

Respondent: Michael Moscaritolo, Director, Network Deployment

MS. CARPINO: Have either of you ever shared a cage with another carrier?

MS. HENDERSON: In what Bell Atlantic considers a shared-collocation arrangement?

MS. CARPINO: Yes.

MS. HENDERSON: AT&T has not.

MR. MOSCARITOLO: Covad has not, either.

We find the entire process to be quite defeating, in that it's incumbent upon us to go find a CLEC who is located in a central office and then to try and knock on every other CLEC's door to find out if they're willing to sublease space or share space within their caged physical arrangement. That information is extremely difficult to come by. Bell Atlantic doesn't share it. It's not posted.

So, to answer, no, we do not -- we have not subleased space from any other CLEC within the State of Massachusetts or anywhere within Bell Atlantic's territory -- or anywhere on the East Coast, for that matter.

MR. WREGG: Bell Atlantic doesn't provide any guidance on that process?

MR. MOSCARITOLO: No, they just say that -- to paraphrase, they have blind eyes. That's between the CLECs. It's not their concern.

MR. WREGG: But they won't provide you -- Let me back up a second. Has Covad ever asked them for information about who is located where?

MR. MOSCARITOLO: The answer to that question is yes.

MR. WREGG: And have they provided it in response?

MR. MOSCARITOLO: They don't provide that information. Their response is, "We do not

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provide that information."

MR. WREGG: Is that your response as well, Ms. Henderson?

MS. HENDERSON: Well, AT&T has never required shared collocation, so I can't attest to that.

MS. CARPINO: Mr. Moscaritolo, how recent was that Bell Atlantic response? Do you recall?

MR. MOSCARITOLO: It probably was -- I'm going to suggest that it was nine months ago, or six months ago, the last time we asked, because that would have been when we were closed out of looking for solutions in the Westford, Massachusetts central office, and the Hopkinton central office, before they "found" space.

MS. CARPINO: Was that request made in writing or was it verbal?

MR. MOSCARITOLO: I would suggest it was probably an e-mail request, not a very formal request.

MS. CARPINO: And the Bell Atlantic response was also via e-mail?

MR. MOSCARITOLO: I honestly do not know. I'd have to go back and look. I don't know. But, I mean, Bell Atlantic has consistently maintained that that information is proprietary and they do not share it.

MS. CARPINO: I'm going to ask as Record Request 164 for to you check to see if you have anything in writing from Bell Atlantic indicating what you just stated.

MR. MOSCARITOLO: Very well.
(RECORD REQUEST.)

Response to 164:

To Mr. Moscaritolo's knowledge, there are no emails on this subject in his possession. Bell Atlantic

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first became willing to discuss shared collocation with Covad in 1998 before BA offered SCOPE and CCOE and in response to Covad's repeated requests for cageless collocation. Covad considered shared collocation at that time. However, Covad found the option to be impractical because BA would not let Covad know what CLECs were already collocated in no-space COs. In other words, Covad would have to independently find out which CLECs were already collocated in BA's COs. At some time during this time period, BA did offer to post on its website a list of CLECs that were interested in shared collocation if the CLECs were willing to share this information. Mr. Moscaritolo is unaware of whether this posting has occurred.

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Record Request 169:

Respondent: Michael Moscaritolo, Director, Network Deployment

MS. CARPINO: How much less expensive is it for you to use cageless collocation as opposed to building a cage?

MR. MOSCARITOLO: That's somewhat of a mystery, because Bell Atlantic really doesn't spell out -- I personally do not know what the security cost arrangements and/or any space-preparation arrangements will become from Bell Atlantic on its recurring/nonrecurring basis. I can't answer that question. I don't know.

MS. DAVIS: What we can say, though, or what we can provide, is what we have paid throughout the region for caged collocation, if that's helpful. In other words, we've seen average prices as high as several hundred thousand dollars for 100 square feet for a caged location, under Bell Atlantic's prior policy, which has changed now.

MR. BEAUSEJOUR: Our collocation rates, at least the physical rates, are approved rates by the Department, both the recurring and the nonrecurring.

MS. HENDERSON: For building a cage?

MR. BEAUSEJOUR: Absolutely. They were approved by the Department in the consolidated arbitrations for traditional physical collocation.

MS. DAVIS: I believe they were approved before the new rules came out.

MR. BEAUSEJOUR: Well, the new rules -- there were no rules relating to the physical collocation. That traditional physical-collocation offering was reviewed and approved by the Department in the consolidated arbitrations.

MS. DAVIS: Before the FCC's rules were put out that now prohibit Bell Atlantic from separating us. So the rates that have been approved

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to date in Massachusetts for collocation did not have the benefit of that FCC order -- which I believe is one of the reasons we're going to hearing on the collocation tariff in Massachusetts next week. The rates haven't been approved pursuant to those new FCC collocation rules.

MS. CARPINO: I was actually more interested in a comparison between the cost of cageless as opposed to traditional physical caged collocation. So if you're not able to provide that.....

MR. BEAUSEJOUR: That's the subject for next week's hearings.

MS. DAVIS: Do you mean the actual ones we've received or what we believe are the appropriate costs for cageless versus --

MS. CARPINO: When you say what you believe are the appropriate costs, I'm really more interested in what actually is the cost or was the cost for a cageless arrangement.

MR. MOSCARITOLO: In the State of Massachusetts?

MS. CARPINO: Not necessarily. If you could provide that in another state, that would be fine.

MS. DAVIS: Maybe we can provide you a comparison of physical-collocation prices across the country, including Bell Atlantic, and then cageless across the country. Do you want that kind of comparison?

MS. CARPINO: That would be fantastic. And that would be Record Request 169.

(RECORD REQUEST.)

Response to 169:

Cageless collocation prices received by Covad to date:

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USW: 2 bays - \$18,000
 4 bays - \$27,656
 6 bays - \$45,656

GTE: \$34,400 - \$67,603

Pac Bell: \$15,000 flat rate

Ameritech: No cageless rate

SWBT: Interim rates:

Two-Framed Bay Collocation: \$10,000

Four-Framed Bay Collocation: \$15,000

Six-Framed Bay Collocation: \$25,000

(Non recurring charges are added in and costs have ranged between \$33,000 and \$48,000).

\$40,000 to \$101,000 (Arkansas, MO, and KS)

BellSouth: \$30,000 (average)

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Record Request 181:

Respondent: Michael Moscaritolo, Director, Network Deployment

MR. BEAUSEJOUR: While we're on the subject of MOPs, it might be time to ask a record request of both AT&T and Covad: for the last six months, collocation nodes completed within that period, the MOPs that they have and any service-quality issues that they noted with respect to the offices that were turned over in that area.

MS. HENDERSON: A clarification on that. You're asking us to provide you a copy of a MOP?

MR. BEAUSEJOUR: Your MOP, right. Any issues that AT&T has noted with respect to the collocation nodes turned over in the last six months.

MS. HENDERSON: Wouldn't your local collocation coordinator have that already?

MR. BEAUSEJOUR: We have that information. We'd like to see if we have the same understanding as to what, if any, issues there were with the collocation cages turned over within the last six months.

MS. CARPINO: For AT&T that will be Record Request 180. For Covad it will be 181.

(RECORD REQUESTS.)

[add'l discussion of this issue:

MS. CARPINO: I think Mr. Mandl and Mr. Schaefer have a point. Can we assume that if we don't hear from Bell Atlantic it's because they agree that their version or their copy of the MOP matches identically the copies that AT&T and Covad will provide us with?

MR. BEAUSEJOUR: Yes.

MS. DAVIS: Otherwise you'll provide refuting documents?

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MR. BEAUSEJOUR: That's correct.]

Response to 181:

Mr. Moscaritolo does not have the requested MOPs in his possession. However, Covad did not reject any of the 5 collocations that were provided by BA in the last 6 months of 1999. The vast majority of Covad's collocations – 67 – were accepted in 1998 and had deficiencies as described in Response to Record Request 182. Covad believes that BA's ability to provide collocations on time is largely affected by the volume of collocation applications that BA is processing at a given moment of time.

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Record Request 182:

Respondent: Michael Moscaritolo, Director, Network Deployment

MS. CARPINO: Has either carrier ever refused a cage?

MR. MOSCARITOLO: Yes, in the past, until it was corrected.

MS. CARPINO: In Massachusetts?

MR. MOSCARITOLO: Yes.

MS. CARPINO: How long did it take Bell Atlantic to complete the cage before you accepted it?

MR. MOSCARITOLO: It was some time ago. I'd have to go back and recreate it. I don't know off the top of my head.

MS. CARPINO: Do you recall what the items were that were in dispute?

MR. MOSCARITOLO: There were quality issues. There were sizing issues. There was an instance where, I believe it was in the Lawrence, there was a column within the 100 square feet. But I'd have to recreate it. Some of these are over a year, year and a half old. I'm searching from memory, and it's difficult. We now have 900 physical collocations, and I just can't recall.

MS. CARPINO: Could we take that as a record request and have you provide us with examples in which you disputed the quality of the cage and what results.

MS. BALLARD: And the dates.

MS. CARPINO: That will be 182.

MS. HENDERSON: AT&T has some situations, also.

MS. CARPINO: That will be 183 for AT&T.

MR. SCHAEFER: Was there a time frame on that?

MS. CARPINO: We've been requesting a week, but --

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MR. SCHAEFER: I meant a time frame over which the cages were accepted or rejected.

MS. CARPINO: Within the past year.

MR. BEAUSEJOUR: Just for clarity, it's within Massachusetts.

MS. CARPINO: Right, within Massachusetts.

(RECORD REQUESTS.)

MS. CARPINO: We'd requested AT&T limit it to a year, but you said your problem was in excess of a year, so just provide us -- if it happened a year and a half ago, then provide us with it.

MR. MOSCARITOLO: All right.

Response to 182:

Mr. Moscaritolo no longer possesses documents on collocations that he accepted from BA in Massachusetts. Among the deficiencies encountered included incorrect sized cage or collocation space; access denied to central offices: no keys or swipe cards provided; collocation location was far from the POT Bay and caused Covad to incur additional costs to cable to the POT Bay; and access denied or impaired by asbestos removal, among others.

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Record Request 189:

Respondent: Michael Moscaritolo, Director, Network Deployment

MS. BALLARD: Then I would just like to ask both parties for a record request: For your last ten collocation applications, if you could please indicate how many were on time and how many were not on time in, I guess, the average 76-day interval per what Bell Atlantic would note is on time and then also how many were on time or not on time per what AT&T and Covad perceive as on time.

MR. SCHAEFER: That would be the last ten that turned up?

MS. BALLARD: Yes. And could you please indicate for those ten if it was a special request or if it's just the regular interval. Then, for those collocation applications that Bell Atlantic perceived were on time and that you did not believe they were on time, could you provide outstanding specific issues that prevented the space from being operational. Then for the applications that both Bell and AT&T and Covad agreed were not ready, could you for those as well list the outstanding issues that made the spaces not operational, or ready to turn over.

MS. CARPINO: AT&T, that will be 188, and Covad will be Record Request 189.

MR. BEAUSEJOUR: Could the record response indicate the specific offices?

MS. CARPINO: Okay. So modified.
(RECORD REQUESTS.)

Response to 189:

It is Mr. Moscaritolo's recollection that the 5 collocations that were provided in 1999 were on time or within the 90 business day interval (or four months). However, when BA has been faced with high volumes of collocations to process for Covad, the quality and timeliness of the collocations suffered. See Covad's response to Record Request 182.

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Record Request 191:

Respondent: Michael Moscaritolo, Director, Network Deployment

MS. CARPINO: Also a few weeks ago, during the Bell Atlantic tech session, we had discussed the 10-foot guideline that Bell Atlantic uses in Massachusetts. It was the subject of a New York PSC order, I believe, in which they removed that 10-foot term, the guideline. What has been your experience in New York since they withdrew that 10-foot guideline?

MS. DAVIS: The 10-feet minimum space requirement between the CLEC and ILEC.

MR. SCHAEFER: I believe that's the same order that is the subject of a record request to Covad. I could be mistaken, but I think it's the same order.

MS. DAVIS: It is.

MR. SCHAEFER: It has a buffer that would generally separate a cageless arrangement from Bell Atlantic equipment, and if you take away the 10-foot buffer, there's less segregation.

MS. CARPINO: But I was wondering, has it been implemented?

MS. HENDERSON: To my knowledge, I haven't heard. We can simply check and find out, but to my knowledge, I haven't heard.

MS. CARPINO: Why don't we do a data request. If you have this information, inform us when you have less than a 10-foot buffer between your equipment and Bell Atlantic's.

MS. DAVIS: Do we have less than 10 feet?

MS. CARPINO: Yes.

MR. BEAUSEJOUR: Is this Massachusetts?

MS. CARPINO: How burdensome would it be to provide us with Massachusetts and New York? If it is, then we'll just focus on Massachusetts.

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MS. DAVIS: We can provide that.

MS. CARPINO: Covad will be Record
Request 190.

MR. SCHAEFER: We can do both states.

MS. CARPINO: AT&T will be 191.

(RECORD REQUESTS.)

MR. BEAUSEJOUR: There are only three or
four in Massachusetts.

MS. DAVIS: We can provide the answer
for the rest of the region as well, because it is a
fairly small number of total CCOEs. Right?

MR. MOSCARITOLO: Yes. It's very
consistent from state to state, LCC to LCC. Each
geography is slightly different. If my memory
serves me correctly, we have been as close as 2 feet
away or 3 feet away.

Response to 191:

BA has not often implemented the 10 foot minimum requirement. The vast majority of Covad's CCOE arrangements in the Bell Atlantic region are located in SCOPE rooms. SCOPE rooms are fully segregated collocation rooms, within which Bell Atlantic permits CLECs to place equipment in a cageless arrangement. In a minority number of Covad's CCOE arrangements (including at least one in Massachusetts), there has been less than 10 feet between Covad's equipment and Bell's equipment.

It is Covad's position that BA collocation practices violate the FCC's *Advanced Services* Order. Contrary to the FCC's rules that require BA to offer cageless in any unused space in its premises, BA still requires complete segregation of CLEC equipment from the rest of the CO (SCOPE rooms) and requires a 10 foot minimum and separate lineup.

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Record Request 209:

**Respondent: Minda Cutcher, Vice President, ILEC Relations
Michael Clancy, Director, ILEC Relations**

MR. ROWE: Can I turn to Ms. Cutcher and ask a question based on what Ms. Davis said. In the data you're providing under 197, will you identify the same data response in this manual engineering query and also mechanized in volumes? Or do we set up a different request?

MS. JIN DAVIS: For November?

MR. ROWE: Yes. If it's your intention to put it in 197, I'm fine, but I'd like to make sure it covers the mechanized requests as well.

MS. JIN DAVIS: Okay. To the extent we can extract that information. I'm not sure of the answer, but we'll endeavor to provide it.

MS. CUTCHER: It would make it a lot easier for us if we made it earlier, because our volumes in the last quarter have been significantly larger than before.

MS. JIN DAVIS: Let's see what we can provide.

MR. ROWE: But we want to be clear: We want November data across the board from people, so that we understand where we are.

MS. CUTCHER: As my colleague said, it's going to be a big manual effort, so we'll do the best we can in the time given.

MS. CARPINO: Thank you. Why don't we make that a separate request. I think 197 is going to be huge. So that will be 209 for Covad.

(RECORD REQUEST.)

Response to 209:

See also Response to Record Request 255. Covad does not specifically track the time it takes Bell Atlantic to provide either manual or mechanized loop qualification information. However, Covad does

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monitor the time it takes Bell Atlantic to provide a firm order commitment (due date) and in many instances the FOC interval is synonymous with the loop prequal interval. For example, if a loop is in the loop qualification database (mechanized prequal tool), the FOC interval reflects the time by which BA provided prequal information. Covad performed a special study of BA's performance on FOC delivery for New York only and presented the results of this study in BA-NY's 271 case before the FCC. In that study and analysis, Covad discovered that, on average, BA takes 5 business days to provide Covad with a due date. No such special study has yet been concluded for Massachusetts.

Covad would note that the primary issue of contention with regard to loop qualification information regards (1) the type of access to loop information (direct versus indirect access) and (2) the type of loop information that BA is willing to provide CLECs. This issue is being discussed in detail in New York in the DSL Collaborative.

When Covad first began ordering loops from BA in Massachusetts in November, 1998, it could not obtain any loop information from BA. Covad would take orders for all speeds of DSL but cautioned its customers that it might only be able to provide its lowest speed DSL service. When Covad ordered loops that were long (in excess of 18,000 feet), BA rejected these orders on the basis that it was not required to provide long loops to Covad.

Later, in 1999, once BA launched its own DSL service in Massachusetts, BA offered a minimal amount of information on loops, but only on those loops that BA had prequalified for its own DSL service. Thus, BA's position on this issue was that it would only provide the loop information that BA uses for its own retail DSL service. At that time, the only information available on loops was a yes/no response to whether a loop qualified for BA's short loop ADSL service (under 12,000 feet). Covad provides more types of DSL service than BA and also wants to provide long loop DSL service.

BA now provides more loop information in its prequal database but is not yet providing all of the information that Covad needs to determine the type of DSL service it can provide to its customers. In addition, BA has not yet provided CLECs access to all underlying databases such as LFACS that contain loop information.

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Record Requests 255-56:

**Respondent: Minda Cutcher, Vice President, ILEC Relations
Michael Clancy, Director, ILEC Relations**

MR. MAY: A statement was made that at any given point hundreds of orders are without due dates. I guess I was trying to understand specifically what status those -- where in the process those hundreds of orders are. In other words, are they past, say, New York carrier-to-carrier standards; or are you just simply referring to the whole kit and caboodle, ones that still might be within the 72 hours or whatever standard there is; or are you talking about ones that are past, say, 72 hours?

MR. SZAFRANIEC: I think what we're referring to is orders that have run into some kind of a reject or are unable to be completed and there are no due dates on the orders, they're almost like in a limbo state where nobody is really sure whether the order is still going to be processed; if it is, is it going to be processed three months from now or is it going to be processed two weeks from now?

MR. MAY: So correct me if I'm wrong, but the due date comes on the LSRC; is that correct?

MR. SZAFRANIEC: Yes.

MR. MAY: Am I sort of beginning to understand that sometimes you get an LSRC without a due date, that the field is blank?

MR. SZAFRANIEC: I would have to check on this statement. But this is a guess on my part: You do get some kind of a due date, either the due date that you requested but for some reason the due date has been missed and there is no new due date assigned, so you have these orders that are in limbo. For example, if the order was supposed to be delivered a month from now, it goes into some kind of a jeopardy and not delivered, and then the order

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does not have a due date -- there are many orders that do not have a due date. They are just sent out and then you're not sure if anybody is going to pick them up, work them, or are they going to stay there in that state?

MS. CARPINO: Why don't you provide us with the documentation that supports the statement that hundreds of your orders are without due dates.

MR. ROWE: Ms. Carpino, would you be willing to let me modify that in a very specific way?

MS. CARPINO: Yes.

MR. ROWE: I'd like to take those orders that you have for Massachusetts in the month of November, and if you would identify those with PON numbers and include the date of submission and the status, whether rejected or not, and indicate whether or not you have a due date. And if you could, could you also indicate whether those are currently undergoing loop qualification.

COMMISSIONER CONNELLY: When you say indicate whether you have a due date, you mean for the ones rejected?

MR. ROWE: There wouldn't be ones for the rejected. That's going to get rid of a large segment of the orders. Mr. May had it right.

MS. CARPINO: Would you have all that information?

MR. ROWE: But at least that's a finite universe to look at and see where we are.

(Pause.)

MR. SZAFRANIEC: I actually do not know what it will take to provide this data. We will definitely make an effort, and we will have to get back to you.

MS. CARPINO: That will be Record Request 255.

(RECORD REQUEST.)

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MS. CARPINO: Since we're doing record requests right now, I have one also on Paragraph 44, the first paragraph 44, on Page 15.

MR. OTTENBERG: On 255, there's an initial request, and then it was supplemented. So I'm sure that we have exactly the same understanding, could you just define 255 again so I'm clear on what we're looking for?

MS. CARPINO: Alan?

MR. OTTENBERG: Is it limited now just to November?

MR. ROWE: November, Massachusetts.

MR. OTTENBERG: Or is it a snapshot as of some other particular date?

MS. CARPINO: Your statement indicated any given point in time, so why don't we just go as far back as November for this.

MR. OTTENBERG: Starting November 1.

MS. CARPINO: Right, for Massachusetts.

The bullet above that you state that at any given point in time there is a Bell-Atlantic-caused backlog of orders, attributable to a variety of things. Do you know whether or not there's a Covad backlog of orders in Massachusetts today?

MR. SZAFRANIEC: Yes, I do. And the numbers I do not have, so I could provide them for you. But there is a backlog.

MS. CARPINO: Mr. Rowe?

MR. ROWE: On this one, I think this is covered by the data request made of Covad before. But if there's any additional, we welcome --

There was a request made to Covad's provisioning witness, who came before, in this area of tracking through your orders and where do they stand and how many were missed and why were they missed. So we weren't going to ask a data request --

MS. CARPINO: Is this 197?

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MR. ROWE: There have been a few.

MR. SZAFRANIEC: So that may be true.

I'm not sure.

MS. CARPINO: We'll keep it as 256, and if it's provided in another Covad data request, then just refer back to that.

MR. OTTENBERG: Again, for clarification, are we talking about just for the period November 1 to date, or are we talking about some other date?

MS. CARPINO: It can be November 1 to the present in Massachusetts.

(RECORD REQUEST.)

Response to 255:

It would be unduly burdensome for Covad to provide all of the information requested by BA. However, Covad's data reveals that for the month of November, 1999 in Massachusetts, 94.8% of Covad's orders received FOCs (due dates) after 24 hours and 47.5% of Covad's orders received FOCs (due dates) after 72 hours.

Response to 256:

No further information than that which has already been provided is available on this issue.

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Record Requests 259-60:

**Respondent: Minda Cutcher, Vice President, ILEC Relations
Michael Clancy, Director, ILEC Relations**

MR. ROWE: It may be that we have room to come together on this. Your next-to-last bullet in that paragraph, which is now on Page 16, says, "Loop information is not provided in a timely manner."

MR. SZAFRANIEC: Which one are we talking about?

MR. ROWE: It's the second bullet on Page 16, at least in my form of the testimony.

Do you have that?

MR. SZAFRANIEC: Yes, I have it.

MR. ROWE: I'd like to ask a record request for, again, Massachusetts November orders, identified by Covad PON, with Bell Atlantic service order if you can, that would identify when the request was submitted to Bell Atlantic, whether or not it was a request for manual or mechanized loop qualification, and when you received that response from Bell Atlantic.

MS. CARPINO: And how far back?

MR. ROWE: Massachusetts, month of November.

MS. CARPINO: That will be Record Request 259.

(RECORD REQUEST.)

MS. CARPINO: Mr. May, do you want to modify that?

MR. MAY: No, I just want to ask Mr. Szafraniec whether it's his understanding that this statement was based on Massachusetts data or New York data or both.

MR. SZAFRANIEC: I have to tell you that this statement, although it belongs under OSS, definitely has to be referred to somebody else

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within Covad for clarification. So while I wanted to address many of the points that were made here, including EDI interfaces that weren't discussed here, these things would have to be done at a record request.

MR. ROWE: In the bullet that follows that, your last sentence is, "Covad is often unable to obtain the status of orders or assistance of orders in a timely fashion." Is it your understanding that Covad can consult the service-order-inquiry function and the installation-status function in preorder to obtain exactly that information?

MR. SZAFRANIEC: I'm going to speak to this even though I don't consider myself an expert in making sure that all orders flow in the interfaces. But from what I have seen, knowing the status of the order is not exactly night and day in the system. You receive multiple responses. And trying to figure out exactly what the status of that order is requires some subjective interpretation of what was responded -- what the system is trying to convey.

MR. ROWE: For example, if you're going looking for status of order in the service-order inquiry, will you be told that the order is currently in the assignment step?

MR. SZAFRANIEC: Yes. But I will also see ten other messages that will put that order in some kind of other state, and now I have to determine what is the current, which one is more viable, which one do I really have to take care of. If you provide me with --

Just from a systems perspective, if you submit an order with 2,000 elements, 50 of them have a problem, and how is that information conveyed back to me? Are you going to respond and say, "This entire section has a problem," or are you going to

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give me responses that each individual part of this has a problem and now I have to go through some kind of a process of interpreting of how do I fix this?

MR. ROWE: Have you raised this issue of, not whether you can get the information, but your use or understanding of the information with Bell Atlantic? And if so, with whom?

MR. SZAFRANIEC: Again, this gets escalated out of the office out of Boston, so I would have to check with them what the escalation processes have been, any trouble tickets that have been opened.

MR. ROWE: I'm going to ask for that as a data request, to know who this issue of understanding the service-order-inquiry function and/or the installation-status function has been raised with at Bell Atlantic.

MS. CARPINO: That will be 260.
(RECORD REQUEST.)

Response to 259:

Covad does not specifically track the time by which BA provides manual and mechanized loop information. Covad also does not record whether a loop order was subject to a manual or mechanized loop qualification inquiry. Covad has performed a special study on FOC (due date) interval performance for New York only and is in the process of doing a similar study for Massachusetts. Covad will provide the results of this analysis when it becomes available. See also Response to Record Request 255.

Response to 260:

Covad has escalated loop qualification issues to many individuals at BA including but not limited to Claire Beth Nogay, John White, Rose Clayton, John Griffin, and numerous BA employees in the TISOC, RCCC, and RCMC including Tiffany Blake, Hank Pilot, Andy Richardson, Linda Hurst, and Paul Lynch. Covad has countless discussions and communications with BA employees on order status including trouble tickets.